

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,
JAMES JACKSON, also known online as
“ONISION,” and LUCAS JACKSON,
formerly known online as
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE NO.: 1:23-CV-00223
Hon. Hala Y. Jarbou

I, Sarah, declare:

1. I am the Plaintiff in this action. I have personal knowledge of the facts stated herein, and, if called on to do so, could and would testify competently thereto.
2. As a young girl, I watched Onision’s YouTube channel and participated in his online forums from my home. I also participated in Lainey’s online forums from my home.
3. I lived within the Western District of Michigan when the Jackson Defendants groomed me, as detailed in the Complaint.
4. Both Onision and Lainey communicated with me knowing I was a minor living within the Western District of Michigan.
5. I used a computer and/or phone located within the Western District of Michigan to view the Jackson Defendants’ YouTube channels and online forums and communicate with them.
6. During the time the events detailed in the Complaint took place, I was at my residence in Michigan, which was within this District, more often than I was at the residence of the Jackson Defendants in Gig Harbor, Washington.

7. During the multiple occasions in which the Jackson Defendants enticed me to cross state lines and fly to Washington, I departed from my residence, located in the Western District of Michigan.
8. The Jackson Defendants purchased flights to transport me to Washington on multiple occasions.
9. My mother signed paperwork giving Lucas Jackson medical and financial power of attorney and guardianship over me in the Western District of Michigan.
10. When the Jackson Defendants learned that another related lawsuit had been filed against them in the Middle District of Florida, they called me on my phone and attempted to manipulate me into not filing this lawsuit against them. I was at my home, located in the Western District of Michigan at the time.
11. When James Jackson defamed me, as described in the Complaint, I was living and working in the Western District of Michigan at this time.
12. The actions of the Jackson Defendants harmed me and caused me damages while I was in the Western District of Michigan.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of May, 2023 in Michigan.


Sarah _____

Sarah